

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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WAGO VERWALTUNGSGESELLSCHAFT MBH  
WAGO KONTAKTECHNIK GMBH & CO. KG

Plaintiffs,

vs.

Case No.  
1:11cv756

ROCKWELL AUTOMATION, INC.,

Defendant.  
-----X

VIDEOTAPED DEPOSITION OF  
PAUL KENNETH WRIGHT, Ph.D.

February 26, 2013

9:27 a.m.

Reported by:  
PATRICIA GOULET, CSR 8315  
Job Number 29064

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6 BE IT REMEMBERED that on February 26th,  
7 2013, commencing at the hour of 9:27 a.m., at  
8 Regus Center, 50 California Street, Suite 1500,  
9 San Francisco, California, before me,  
10 PATRICIA GOULET, a Certified Shorthand Reporter in  
11 and for the State of California, duly authorized to  
12 administer oaths pursuant to Section 30(c) of the  
13 Federal Rules of Civil Procedure, personally  
14 appeared:

15 PAUL KENNETH WRIGHT, Ph.D.  
16 called as a witness herein on behalf of the  
17 Plaintiff, who, having been first duly administered  
18 an oath, was thereupon examined as hereinafter set  
19 forth.  
20  
21  
22  
23  
24  
25

A P P E A R A N C E S :

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1 of ordinary skill in the art to say, hey, instead of  
2 using pressure contacts, or instead of using these  
3 pressure tabs and mating services that are pushing  
4 these apart, let's just use the knife and fork  
5 contacts because that's their equivalent, and they  
6 don't have this result of pushing them apart. So  
7 why don't we just use those? Because it would be  
8 obvious to a person of ordinary skill in the art to  
9 use a knife and fork contact in place of the bus  
10 contact that's being referred to in column 2, lines  
11 58 through 62?

12 A. No.

13 Q. Why not?

14 A. We have six, the embodiments show six --  
15 excuse me.

16 The embodiments show six of these kinds of  
17 contacts: six, 10 and 11.

18 Q. And you're referring to the bus contacts?

19 A. Yes.

20 Q. Yes.

21 A. To have an alignment of six knife and  
22 forks here, and to spend the extra money on doing  
23 that, that wouldn't seem a rational thing to do to a  
24 person of ordinary skill in the art.

25 Q. Okay.

1           Would using knife and fork contacts there  
2       be harder to do than to use --

3           A.    Yes.

4           Q.    Why is that?

5           A.    Because when these buttons turn -- let's  
6       call them buttons.

7           Q.    Buttons, referring to, again, are these  
8       bus contacts, six of them in a row?

9           A.    Yeah, items 10.

10          Q.    Items 10?

11          A.    Items 10.  Items 10 have got a press  
12       against item 11, and from a simple assembly process  
13       to get six of these in a row, like a knife and fork  
14       connection, to make sure they slotted in, that would  
15       be really hard to do.  It would be very expensive to  
16       make, especially in the early 1990s.

17          Q.    Are there any other disadvantages to using  
18       a knife and fork contact there besides just expense?

19          A.    Not that I can think of.

20          Q.    I know you didn't review the German patent  
21       that was listed on the front of the '241 patent,  
22       that the '241 patent claims priority to, but my  
23       question is:  Did you review the prosecution history  
24       for that German patent?

25          A.    In Germany?